

JAP:VHT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

KARSEEM WILSON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ISMAEL HERNANDEZ, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), duly appointed according to law and acting as such.

Upon information and belief, on or about May 23, 2008, within the Eastern District of New York, the defendant KARSEEM WILSON did knowingly and intentionally possess in and affecting interstate commerce a firearm, to wit, a loaded Hi-Point .380 caliber handgun, after having been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year.

(Title 18, United States Code, Section 922(g))

The source of your deponent's information and the grounds for his belief are as follows¹:

¹ Because the purpose of this affidavit is only to establish probable cause to arrest, I have not set forth a description of all of the facts and circumstances of which I am aware.

N-08-559

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT

(T. 18, U.S.C., Section
922(g))

1. I am a Special Agent with ATF. My information in this case comes from reviews of records of the New York City Police Department ("NYPD"), conversations with police officers and other official records of government agencies.

2. On or about May 23, 2008 at approximately 12:00 a.m., in the vicinity of 12-20 34th Avenue, Astoria, Queens, New York, NYPD officers were canvassing the area surrounding the Ravenswood Houses. The officers recently left the scene of a shooting that occurred approximately 15 minutes earlier, several blocks away, in which a victim suffered a gunshot wound to the foot.

3. While canvassing the area the officers noticed the defendant KARSEEM WILSON, dressed in a black cap and black jacket, walking in a crouched position with his head down, near the side of a building. As the officers' vehicle neared the defendant, the defendant KARSEEM WILSON abruptly turned his body and began to walk in the opposite direction.

4. The officers called out to the defendant KARSEEM WILSON, identified themselves as police, and asked him to stop so they could question him about the shooting.

5. When the defendant KARSEEM WILSON did not stop, the officers, who were dressed in NYPD police uniforms, exited their vehicle and reiterated their request that the defendant stop. At that time the defendant KARSEEM WILSON began to run.

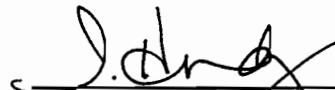
6. Both officers then ran after the defendant KARSEEM WILSON. One officer followed the defendant as he ran into 12-20 34th Avenue. The officer pursued the defendant up the stairs inside the building. During the pursuit, the officer observed the defendant KARSEEM WILSON drop what appeared to be a firearm to the floor.

7. As the defendant KARSEEM WILSON ran out of the building he was apprehended by a second officer. Officers then retrieved a loaded Hi-Point .380 caliber handgun from the floor of the building where they observed the defendant drop the gun.

8. A review of the defendant KARSEEM WILSON's criminal record reveals that the defendant has been convicted of a crime punishable by a term of imprisonment of more than one year. Specifically, on July 30, 1997, the defendant was convicted in New York State Supreme Court, Orange County, of Attempted Criminal Sale of a Controlled Substance in the Third Degree, a Class C felony.

9. I am an interstate nexus expert and have determined that the above mentioned Smith and Wesson .380 caliber semi-automatic pistol was manufactured outside of the state of New York.

WHEREFORE, your deponent respectfully requests that the defendant KARSEEM WILSON be dealt with according to law.



ISMAEL HERNANDEZ
Special Agent,
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn
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THE HC
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

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